

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-21

SAMY MOHAMMED HAMZEH,

Defendant.

---

**GOVERNMENT’S MOTION TO SEAL**

---

The United States of America, by United States Attorney Gregory J. Haanstad and Assistant United States Attorney Paul L. Kanter, hereby moves the Court to seal the three discs – but not the two-page letter that accompanied the discs – that the United States submitted to the court on July 13, 2017 (Docket #57). Sealing the discs will accommodate three interests:

1. It will allow the Court’s in camera review of the audio and video contained on the discs, as the Court and the parties have agreed is appropriate;
2. It will allow the material on the discs to be made part of the record, albeit under seal; and
3. It will be consistent with and comply with the protective order that United States Magistrate Judge William E. Duffin entered in this case on December 21, 2016.

The United States requests that, based on the foregoing, the Court enter an order sealing the three discs (marked Disc 98; Disc 99 – Part 1; and Disc 99 – Part 2) that the government submitted under letter dated July 13, 2017.

Dated at Milwaukee, Wisconsin, this 25<sup>th</sup> day of July, 2017.

Respectfully submitted,

s/ Gregory J. Haanstad  
GREGORY J. HAANSTAD  
United States Attorney  
Wisconsin Bar: 1036125  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 E. Wisconsin Avenue, Room 530  
Milwaukee, Wisconsin 53202  
Telephone: (414) 297-4581  
e-mail: [greg.haanstad@usdoj.gov](mailto:greg.haanstad@usdoj.gov)